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March 6, 2024

Via ECF

The Honorable Paul G. Gardephe
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

Re: De'Bev v. City of New York, et al., No. 20 CV 1034 (PGG)(SLC)

Dear Judge Gardephe:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, the Honorable Sylvia O. Hinds-Radix, attorney for Defendants City of New York, Mubanga Nsofu, Marsha Weekes, Stephanie Eiel, Officer Castellano, and Conrad Seivwright (collectively, "Defendants") in the above-referenced action. With Plaintiff's consent, I write to respectfully request a 31-day extension of the parties' time to submit objections to the February 23, 2024 Report and Recommendation ("R&R") of the Honorable Sarah L. Cave with respect to the parties' cross motions for summary judgment.

This extension is requested in light of the fact that I am still discussing the holdings of the R&R with clients at the New York City Police Department and the Administration for Children's Services to determine their respective positions on making any objections to the R&R with respect to the various claims and defendants it addresses. The requested extension would thus allow for additional time to complete these discussions and to draft any resultant objections.

The parties' present deadline to file their objections is March 8, 2024. The requested 31-day extension would move this deadline to April 8, 2024. This is Defendants' first request for an extension of their time to file objections to Magistrate Judge Cave's R&R. As noted, Plaintiff has graciously consented to this application (and requested a reciprocal extension of his time to file objections, which I have reflected by seeking an extension for all parties).

I thank the Court for its consideration of this application.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer

cc: ***Via ECF***
John De'Bey
Plaintiff pro se

MEMO ENDORSED

The Application is granted.

SO ORDERED:

A handwritten signature in black ink, reading "Paul G. Gardephe", written over a horizontal line.

Paul G. Gardephe, U.S.D.J.

Dated: March 7, 2024